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March 11, 2021

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 11D
New York, NY 10007

> Re: Vincent G. Gargiulo v. S. Katzman Produce, Inc. v. Hunts Point Terminal
> Produce Cooperative Association, Inc.
> Case No.   1:19-cv-11726-PKC
> Our File No.: 32341

Your Honor:

This office represents the third-party defendant, Hunts Point Terminal Produce Cooperative Association, Inc. in the above-referenced matter.   There is currently a case management conference scheduled for April 13, 2021.

I submit this letter, with the consent of all counsel, to respectfully request that the Court extend the parties time to complete discovery in this matter, from its current fact discovery end date of March 11, 2021, and expert discovery end date of April 30, 2021. We had previously requested an extension of the discovery deadline due to outstanding paper discovery, which was granted.

Paper discovery has now been completed. Yesterday, the parties completed the deposition of plaintiff, Vincent Gargiulo, and the depositions of the defendant and third-party defendant are scheduled for April. In addition, in the coming weeks, the defendants and third-party defendants expect to designate plaintiff for expert medical examinations.

Accordingly, we respectfully request that the deadlines for discovery be extended sixty days, with fact discovery being concluded by May 11, 2021 and expert discovery being concluded by June 30, 2021.

Very truly yours,

ABRAMS, GORELICK, FRIEDMAN & JACOBSON, LLP

By:___*/s/ Steven DiSiervi*_____
            Steven DiSiervi

SD/ma

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